



Solutia Inc
10300 Olive Boulevard
P.O. Box 66760
St. Louis, Missouri 63166-6760
Tel 314-674-1000

June 19, 1998

Mr. Terry Ayers
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P. O. Box 19276
Springfield, Illinois 62794-9276

RECEIVED
JUN 23 1998

SUPERFUND DIVISION
DEPARTMENT OF THE ATTORNEY GENERAL

Re: Sauget Area I
Attached June 12, 1998 letter from M. A. Pierle to Ms. Mary Gade

Dear Terry,

As the attached June 12th letter from Mike Pierle to Ms. Gade discusses, Solutia has respectfully declined IEPA's proposal to voluntarily conduct an RIFS on the entire proposed Sauget Area I Site. However, as Mr. Pierle also states, Solutia continues to welcome an opportunity to conduct voluntary studies and remedial work focused on Creek Sector B. Solutia also remains willing to make any such work NCP compliant and the subject of an enforceable Consent Decree with the Agency.

As we are all aware, the proposal to list Sauget Sites Area I on the National Priorities List (NPL) incorporates an expansive array of independent sites involving multiple contaminant sources, multiple PRPs (not all of which are currently viable), and consequent complex liability questions. Solutia has determined that it would not be prudent to voluntarily and singularly take on responsibility for an RIFS covering such a diverse and complicated Site, one certain to have broad public involvement and complex PRP apportionment issues. Additionally, Solutia has formally commented on the proposed listing and maintains the position advocated in those comments, that the listing proposal is inconsistent with applicable protocols within the NCP listing procedure.

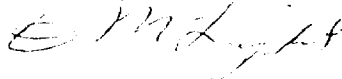
Nevertheless, Solutia believes that it is in the best interest of all PRPs, the Regulatory Agencies and the affected communities of Sauget and Cahokia to pursue priority risk reduction in Sauget Area I. Therefore, if there is interest on the part of IEPA in pursuing a voluntary course of action to achieve early risk reduction through focused studies and significant remedial action within Creek Sector B - without compromising the Regulatory Agencies' CERCLA options - I offer my availability and that of our technical / legal resources to discuss specifics with IEPA and to develop together the voluntary proposal

Formerly the chemical businesses of Monsanto Company

to address Sector B issues. I repeat that Solutia is willing to agree to make this voluntary work NCP compliant and the subject of an enforceable Consent Decree.

If you wish to discuss this option further, please call me at (314) 674-1617

Sincerely,

A handwritten signature in dark ink, appearing to read "D. M. Light", written over the printed name.

D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc: Ms. Liah Evinson, USEPA Region V
Bill Muno - USEPA Region V



Solutia Inc.
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June 12, 1998

Mary A. Gade, Director
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P. O. Box 19276
Springfield, Illinois 62794-9276

Re: **Sauget Area I**

Dear Ms. Gade:

Following our telephone call of March 3, receipt of your March 20, 1998 letter, and receipt of a draft Sauget Area I Sites R1/FS and Draft consent decree, I understand representatives of IEPA and Solutia have had several conversations attempting to reach agreement on a set of actions that would lead to further remedial actions in Sauget Area I. Today, agreement has not been reached. As we endeavor to move forward and IEPA continues to express flexibility within the boundaries of the NCP and an enforceable consent decree, I remain optimistic that, with our involvement, progress can be achieved.

Therefore, Solutia respectfully declines your offer as defined in your letter of March 20 and as we have come to understand the prerequisites to that proposal through subsequent discussions with your Agency. Nevertheless, as evidenced by the magnitude (estimated at \$15 Million - \$20 Million) of the voluntary proposals made to IEPA to date and combined with Solutia's commitment to enter into enforceable agreements with the Agency incorporating these voluntary proposals, Solutia has demonstrated its commitment to do its responsible, fair share of the work to address environmental issues within the proposed Site on a priority basis. Solutia remains willing, with strong business performance continuing, to commit to performance of a voluntary study and removal of risk/remediation of Sector B. We remain in agreement to perform this work consistent with the NCP and the subject of a negotiated, enforceable Consent Decree. And we are prepared to work with IEPA on the definition

of an RI/FS plan for the balance of Area 1 and identification of PRPs. Execution of the RI/FS by all PRPs would follow.

Solutia continues to believe that this voluntary approach, combined with an enforceable agreement, is the most cost effective and environmentally responsible means for the Agency and Solutia to begin in a priority manner to equitably address the environmental issues surrounding Sauget Sites Area I. I would recommend we meet on our proposal at your earliest convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Pierle', with a stylized, cursive flourish.

Michael A. Pierle
Vice President, Environment, Safety & Health

cc: D. Michael Light ✓